## EXHIBIT I

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORKX	
JENNIFER HOUGH,	
Plaintiff,	Case No. 21-cv-04568-ENV-JRC
against	NOTICE OF MOTION
ONIKA TANYA MARAJ, AKA ("NICKI MARAJ") and KENNETH PETTY, AKA ("ZOO"),	NOTICE OF MOTION
Defendants.	

**SIRS**:

PLEASE TAKE NOTICE that, after the expiration of the time period prescribed by Fed. R. Civ. P. 11(c)(2), Defendant Onika Tanya Maraj will move this Court for an Order granting sanctions against Plaintiff Jennifer Hough on the ground that the Amended Complaint was filed in violation of Fed. R. Civ. P. 11(b)(1) and (3).

The grounds for this motion are set forth in the accompanying draft Declaration of Judd Burstein, which he has nonetheless executed.

Dated: Westport, Connecticut December 7, 2021

Yours, etc.,

JUDD BURSTEIN, P.C.

By: /s/ Judd Burstein
Judd Burstein (JB9585)
260 Madison Avenue, 15th Floor
New York, New York 10016
Tel.: (212) 974-2400

Fax: (212) 974-2944 jburstein@burlaw.com Attorneys for Defendant Onika Tanya Maraj UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK -----X JENNIFER HOUGH,

Plaintiff,

-- against--

Case No. 21-cv-04568-ENV-JRC

ONIKA TANYA MARAJ, AKA ("NICKI MARAJ") and KENNETH PETTY, AKA ("ZOO"),

**DECLARATION OF JUDD BURSTEIN** 

Defendants.	
	X

**JUDD BURSTEIN** declares under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct.

- 1. I am the sole shareholder of Judd Burstein, P.C., attorneys for Defendant Onika Tanya Maraj ("Defendant").
- 2. I submit this Declaration in support of Defendant's motion, pursuant to Fed. R. Civ. P. 11, seeking sanctions against Plaintiff Jennifer Hough ("Plaintiff") for (a) having made knowingly false allegations against Defendant in the Amended Complaint, and (b) bringing what is in essence a strike suit filed for the improper purpose of pressuring Defendant into a quick settlement.
- 3. The unvarnished truth is that Plaintiff is a liar. Unfortunately for Plaintiff, she is an incompetent one.
- 4. As shown below, the Amended Complaint's allegations against Defendant are wholly contradicted both by a devastating document which destroys Plaintiff's case and by voluntary statements which Plaintiff made in a March 2021 interview with *The Daily Beast*. Plaintiff knows the truth but has tried to subvert it because she believes that Defendant's celebrity

status makes her an easy target who will pay Plaintiff money to just go away regardless of the truth. Plaintiff could not be more mistaken, as Defendant will never give in to Plaintiff's effort to extort her. The only person who should be paying money here is Plaintiff, who deserves to be sanctioned by the Court for her abuse of the legal system and ordered to pay Defendant's fees.

5. The Amended Complaint alleges that between the period after Plaintiff spoke to Defendant on the telephone in March 2020<sup>1</sup> and August 2020, the following transpired:

A few days after Defendant Minaj called Plaintiff, Plaintiff's brother called her. He stated two people reached out to a family member stating there is an offer of \$500,000.00 from Defendant Minaj if Plaintiff wrote a letter recanting her rape claim against Petty. Plaintiff hung up, distraught that Defendant Minaj's instructed her associates to contact her brother, and her brother would even relay such a message.

\* \* \*

Black continues to receive and relay messages from the Defendants to Plaintiff. For a while, Plaintiff ignored Black's calls. Plaintiff finally answered, and he tells her that he had good news. Black stated that nothing would happen to Plaintiff if she signed and notarized some papers in his possession.

Shortly after the call, Black appeared in front of Plaintiff's home. To protect her children in her home, Plaintiff met Black in front of her house in his car. While in his car, Black pulled out a green-colored folder that had a document inside. This document was a written recanted statement prepared for Plaintiff to sign.

Black then pulls twenty thousand dollars out of the armrest and places it on the Plaintiff's lap. Plaintiff took the money off her lap and placed it on the floor. Plaintiff could not believe that Defendant Minaj would go this far to bribe her.

Black even said that Defendant Minaj would also send happy birthday videos to Plaintiff's daughter for her birthday as a bonus.

Plaintiff has also lied about the circumstances surrounding and the content of her single telephone conversation with Defendant. However, Defendant does not seek sanctions as to these allegations in the Amended Complaint because they resolve into a "he said/she said" dispute. While the proof will show that Plaintiff's account of the call is incredible, there is no external contradictory evidence that would permit an award of sanctions at this time.

\* \* \*

At the end of May 2020, Plaintiff received a call from her brother where he was speaking frantically. The brother stated that they know where she lived, what her daughter does, and threatened to have someone else show up at the Plaintiff's house if she did not recant her 1994 rape claim.

After receiving this threat, Plaintiff moved in June of 2020. She changed her phone number, registering her new number under her husband's name. These efforts by Plaintiff were unsuccessful in curbing the harassment and unwanted contact. Shortly after changing her number, Plaintiff was contacted by a lawyer who was instructed to reach out to her by Defendant Minaj.

Plaintiff became so paranoid that she moved again in August 2020.

Three days after moving in August 2020, the U.S. Marshals showed up at the Plaintiff's husband's job. She called the U.S. Marshals, and they stated that someone had called them to report that Plaintiff was being harassed and they were worried about her safety.

The Marshals offered Plaintiff witness protection. The Marshals also confirmed with Plaintiff that the call she received from California was indeed Defendant Minaj.

(Amended Complaint, at ¶¶ 93, 100-03, 105-09)

- 6. These allegations **central and indispensable to the Amended Complaint as against Defendant** are disproven by a single piece of evidence which is annexed hereto as Exhibit A: a redacted copy of an August 31, 2020 text message to Defendant from Plaintiff, stating: "US Marshalls [sic] are asking questions!!!"<sup>2</sup>
- 7. This single document unequivocally puts the lie to Plaintiff's claims against Defendant. If, as she alleges, Plaintiff moved and changed her telephone number because

Annexed hereto as Exhibit B is a redacted copy of a Lexis Public Record search confirming that the cell phone number from which this text message was sent is registered to Plaintiff. I will of course share unredacted copies of Exhibits A and B hereto with Plaintiff's counsel.

she was in fear for her life by reason of threats made by people supposedly working for Defendant, Plaintiff would never have sent a text message to Defendant revealing the telephone number which she claims to have been hiding.

- 8. This is not a situation where a plaintiff has made some arguably inconsistent statements which might be used at a trial for impeachment purposes. Nor is this a case where a plaintiff alleges that she made a contradictory statement to a third party because she was afraid. Rather, this text message destroys the foundation of Plaintiff's case against Defendant because Plaintiff voluntarily sent it to Defendant, thereby revealing her phone number to the one person from whom she was supposedly seeking to hide it. In fact, the only hiding in this case is Plaintiff's hiding of crucial facts.
- 9. Further, this text message wholly contradicts Paragraph 108 of the Amended Complaint, which alleges that "the U.S. Marshals showed up at the Plaintiff's husband's job," and that she then "called the U.S. Marshals." This inconsistency cannot be just a mistake; it demonstrates that the text message Plaintiff sent to Defendant was a failed effort to convince Defendant to pay Plaintiff off so that she would not say anything negative to the Marshals about Defendant's husband. Either (a) the Marshals actually did come to Plaintiff's home, in which case she has falsely claimed that they came to her husband's office so that she can avoid revealing this damning text message, or (b) as alleged in the Amended Complaint, the Marshals did go to her husband's office and Plaintiff therefore lied to Defendant in the mistaken belief that Defendant would pay Plaintiff not to answer their questions.

- 10. **But there is more**: a March 2021 interview of Plaintiff in *The Daily Beast* (Exhibit C hereto) in which she directly contradicted almost all the material allegations in the Amended Complaint.
- 11. **First**, Plaintiff told *The Daily Beast* that her brother "called within days of her conversation with Minaj to tell her that a man named Jamie from New York had called their cousin in North Carolina, offering \$500,000 if Jennifer **spoke with a lawyer representing Petty**." (Exhibit C hereto at p. 7) (Emphasis supplied) This is a far cry from the allegation in Paragraph 93 of the Amended Complaint that "Plaintiff's brother called her. He stated two people reached out to a family member stating there is an offer of \$500,000.00 from Defendant Minaj if Plaintiff wrote a letter recanting her rape claim against Petty."
- 12. Plainly, Plaintiff's story about this supposed attempted bribe changed because she would have had no basis for suing Defendant if she had stuck with what she told *The Daily Beast* -- *i.e.*, that her brother did not mention Defendant or even convey to Plaintiff that the \$500,000 would be paid to her only if Plaintiff provided a statement exculpating Defendant's husband. Further, there is a material difference between Plaintiff's brother having told her that Defendant was offering her \$500,000 in return for a statement, and Plaintiff merely speculating that Defendant was behind the offer.
- 13. **Second**, *The Daily Beast* article goes on to state: "When asked about the offer, **Barry** [identified as "Black" in the Amended Complaint] **allegedly** <u>denied that the money could</u> <u>have come from Minaj or Petty</u>. **Jennifer recalled him insisting that Petty had no money, and Minaj wouldn't give Petty the money either**. 'So, I was confused as to how all of this was happening around me,' [Plaintiff] said. 'I'm like, 'You say Nicki's not involved, but she's the one

who called me." (Exhibit C hereto at p. 7) (Emphasis supplied)

- 14. This portion of *The Daily Beast* article again shows that, contrary to the allegations in the Amended Complaint, **no one ever told Plaintiff that Defendant was offering her \$500,000** in return for a statement exculpating her husband. In her effort to extort Defendant, Plaintiff inexcusably omitted the most crucial fact concerning the alleged \$500,000 offer: that **Black had denied that the alleged offer had come from Defendant**.
- Third, whereas Paragraph 102 of the Amended Complaint alleges that Defendant was the source of the \$20,000 which Black purportedly offered Plaintiff in his car ("Plaintiff could not believe that Defendant Minaj would go this far to bribe her"), **Plaintiff told** *The Daily Beast* that Black had made it clear to her that he was offering her his own money -- not Defendant's: "Barry allegedly told her he'd recoup his money on the back end." (Exhibit C hereto at p. 7)
- 16. **Fourth**, Paragraph 103 of the Amended Complaint alleges that, at the time Black supposedly offered Defendant the \$20,000, he told her that Defendant "would also send happy birthday videos to Plaintiff's daughter for her birthday as a bonus." This allegation bears no resemblance to what Plaintiff told *The Daily Beast*: "As for why Jennifer's brother and former neighbor were so invested in Minaj and Petty's legal affairs? Barry wanted the rapper to appear at his daughter's 16th birthday party, [Plaintiff] said. Her brother and cousin, meanwhile, allegedly wanted Minaj to do a walkthrough promotion at a club so they could split the profit." (Exhibit C hereto at p. 8) (Emphasis supplied)
- 17. It is inconceivable that Plaintiff could have confused (a) Black supposedly having told her that Defendant was offering to send birthday videos to Plaintiff's daughter

in return for a statement, with (b) Black telling her that he was trying to secure a statement from her because he wanted Defendant to appear at his daughter's birthday party.

- 18. **Fifth**, Plaintiff told *The Daily Beast* that, in June 2020, "she received a call from her brother asking if she was OK. He told her that their cousin had called him again, and that this time he'd sounded terrified, telling him that 'they' knew where she lived.... 'Don't be surprised if they're sitting on your couch.'" (Exhibit C hereto at p. 7) In contrast, Paragraph 105 of the Amended Complaint makes a very different, and egregiously hyperbolic allegation that "[a]t the end of May 2020, Plaintiff received a call from her brother where he was speaking frantically. The brother stated that they know where she lived, what her daughter does, and threatened to have someone else show up at the Plaintiff's house if she did not recant her 1994 rape claim."
- 19. Viewed in isolation, each of these discrepancies between the Amended Complaint and *The Daily Beast* interview might be viewed as mere fodder for cross-examination. But something far more sinister and opprobrious is revealed when they are viewed together: Plaintiff's concerted effort to manufacture a claim against Defendant by inexcusably omitting inconvenient facts which completely contradict her fundamental theory of the case.
- 20. In the end, this case is about two issues vis a vis Defendant: (a) did Defendant use intermediaries to seek to bribe and threaten Plaintiff into providing a statement exculpating her husband, and (b) was Plaintiff truly upset and in fear for her life as a result of conduct by Defendant?
- 21. The overwhelming discrepancies between the Amended Complaint and Plaintiff's interview with *The Daily Beast* lay waste to the Amended Complaint's claim that **only** Defendant had both the motive and the means to offer Plaintiff money and/or threaten her because, as Plaintiff

admitted in her interview with *The Daily Beast*, she understood that Black had an independent motive for offering her money and that her brother also had an independent motive for trying to scare her by falsely telling her that people were conveying threats to Plaintiff's family. It is important to note here that the Amended Complaint's allegations about Defendant having been the source of the attempted bribes and threats are not made on "information and belief." They are unqualified allegations of **fact** which, we now know, Plaintiff herself has previously acknowledged to be false.

- 22. As for the second issue in this case, Plaintiff's August 31, 2020 text message to Defendant demonstrates that she did not move three times and change her phone numbers out of fear for her life by reason of threats made by people supposedly working for Defendant. If that claim were true, it is inconceivable that she would have then voluntarily provided Defendant with her new telephone number even though Defendant had never asked for it.
- 23. In sum, this is a fraudulent case brought by a mendacious plaintiff who mistakenly believed that she could secure a quick payday for herself.<sup>3</sup>

We are not seeking sanctions against Plaintiff's counsel in this motion because they too may be victims of Plaintiff's lies. However, if they continue to defend the Amended Complaint, Defendant will seek sanctions against them. Hopefully, as professionals, they will be as appalled by Plaintiff's lies as I am and take appropriate action.

**WHEREFORE**, for the foregoing reasons, your Declarant prays for an Order sanctioning Plaintiff pursuant to Fed. R. Civ. P. 11.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7th day of December, 2021, in the State of Connecticut, County of Fairfield.

JUDD BURSTEIN

## EXHIBIT A







**Text Message** Aug 31, 2020, 12:49 PM

US Marshalls are asking questions!!! They showed up at my house

**EXHIBIT B** 

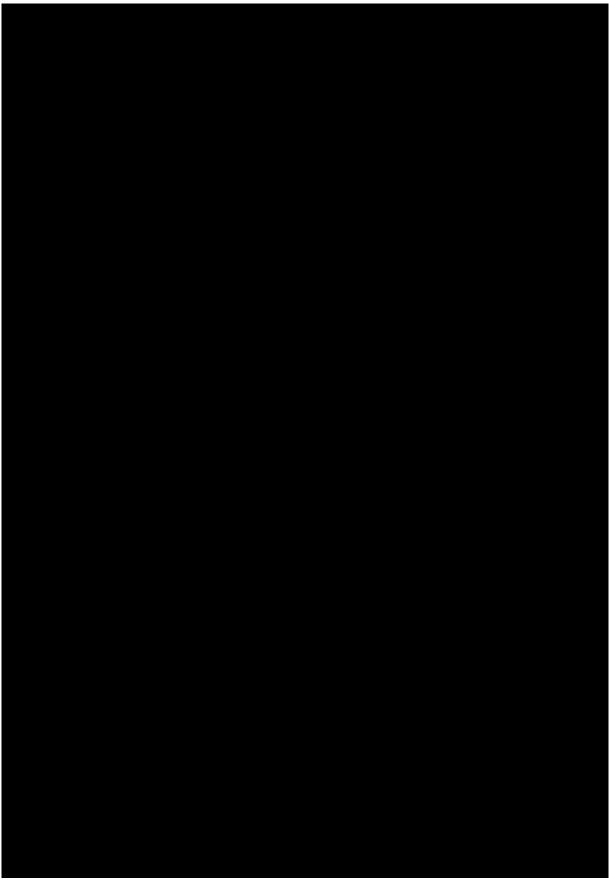


#### 1 OF 1 RECORD(S)

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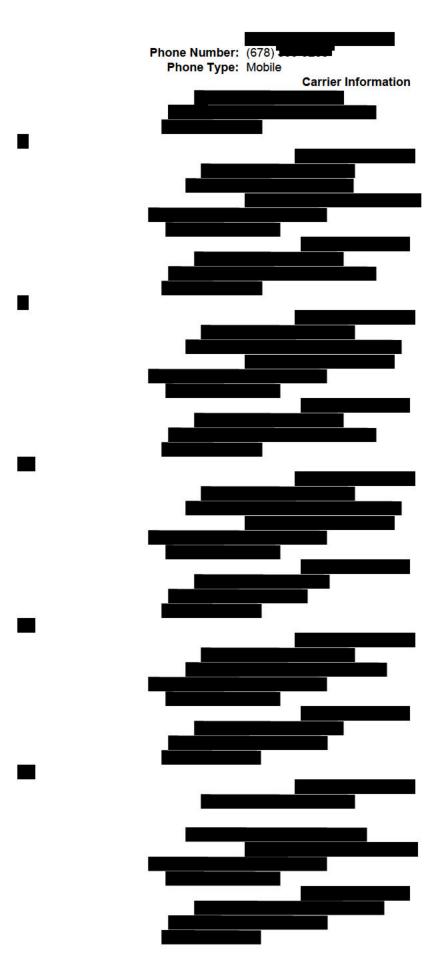
Date:12/6/2021 Report processed by: Judd Burstein PC **Full Name** Address County **Phone** HOUGH, JENNIFER KENYA None Listed ADDITIONAL PERSONAL INFORMATION SSN DOB Gender LexID(sm) **Email** 3/1978 Female SSN linked to (Age:43) multiple people **Subject Summary Name Variations** ELIZABETH HOUGH, JENNIFER KENYA 1: 2: HOUGH, J 3: HOUGH, JENNIFER 4: HOUGH, JENNIFER K 5: HOUGH, JENNIFER KENYA 6: HOUGH, JENNIFER KENYA ELIZABETH 7: HOUGH, JODY **SSNs Summary** No. SSN State Iss. Date Iss. Warnings Most frequent SSN attributed to subject: 1: New York 1978-1980 SSN linked to multiple people DOBS Reported DOBs: 1979 Others Using SSN - 1 records found # **Full Name** SSN DOB 1: 3/1978



**Personal Information** 

Name: HOUGH, JENNIFER

Address:



# EXHIBIT C





X

## Nicki Minaj and Husband Kenneth Petty's Campaign to Silence His Sexual Assault Victim



exclusive

### **Dimitrios Kambouris/Getty**

"Jennifer"—who Nicki Minaj's husband attempted to rape when she was a teen—opens up about the harassment and threats she's received from their camp in order to get her to recant. Published Mar. 04, 2021 4:56AM ET

"When you're somebody's wife, you've gotta be even more prayed up," Nicki Minaj told her audience in a 2019 episode of her Apple Music show, Queen Radio. "Because you've gotta cover your husband in prayer."

The rapper was responding to criticism she'd received for marrying convicted sex offender Kenneth "Zoo" Petty. Minai went on to claim that Petty had been wrongfully accused of attempted rape at the

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age of 15, and that his victim had actually written a letter to the judge back then, in 1995, asking to recant her statement—only to reverse course after she found out she could go to jail for 90 days. "But white is right," Minaj said.

But Petty's victim, who has come forward using only her first name, "Jennifer," is not white; her mother is white and her father is Black. Both she and Petty were 16 years old at the time of the assault, which she reported immediately. She says she never submitted a letter recanting—but alleges that associates of Minaj and Petty's spent months last year harassing her to do so, going so far as to offer hundreds of thousands of dollars on their behalf. At one point, Jennifer says, she also spoke with Minaj herself. (Minaj and Petty did not respond to requests for comment.)

Jennifer moved three times in 2020 out of fear for her safety—the final time out of state, separating her from her 22-year-old daughter. And since she's come forward, a section of the gossip blogosphere has also exploded, as Minaj stans and even some estranged family members attempt to discredit her claims.

The state of California dismissed its case against Petty for failing to register as a sex offender last year in light of similar federal charges, for which Petty faces trial in June. In an interview with The Daily Beast, Jennifer described the "mindfuck" that began last March, when Petty's arrest in California prompted a web of family members and neighbors to contact her on his and Minaj's behalf.

Jennifer also said she's been in contact with U.S. Marshals, who recently told her that an investigation of the Pettys is underway and that they've found evidence. A source familiar with the conversation confirmed this, and said that the authorities called the investigation a "high-priority case."

"I'm hoping for the truth to come out, and whatever comes from that truth, to let it be," Jennifer said. For a while, she'd tried to avoid implicating other people. But now, "after everything that has happened, it's like, these people were willing to sacrifice me so this guy could remain in the public eye," she said. "I feel like my family was willing to sacrifice me."

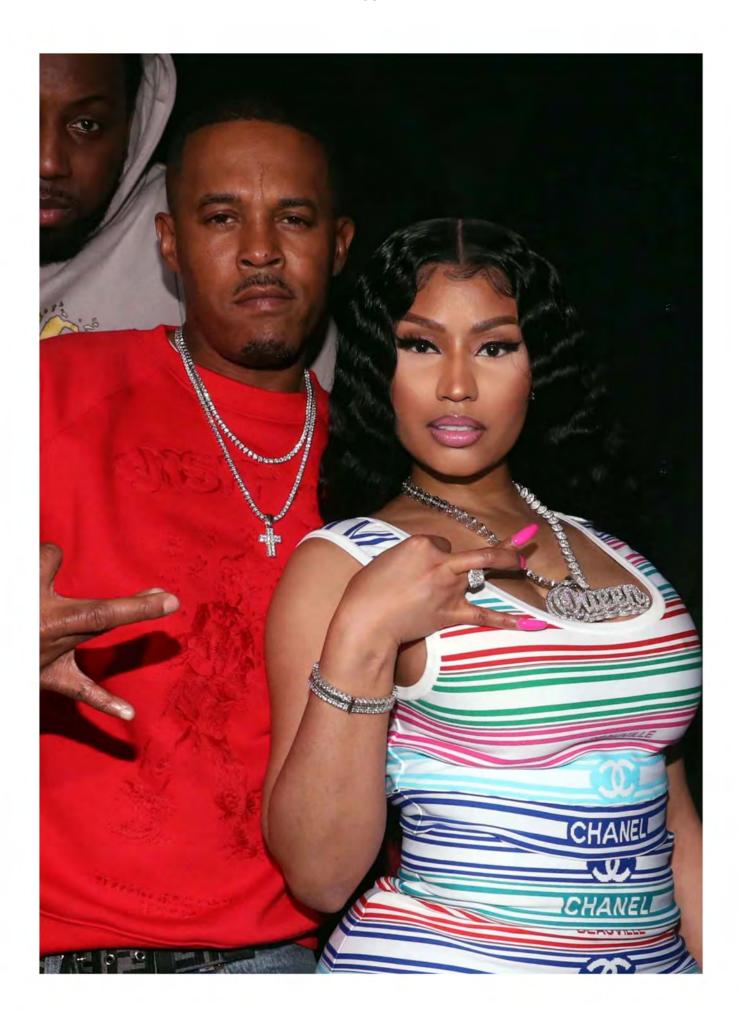
Gossip blogger NoseyHeauxLive, who has advocated for Jennifer on her channel for months using the hashtag #SurvivingThePettys and interviewed her, believes that the inaccuracies in Minaj's comments about Petty's victim were intentional. "I know from being a Black person, when you tell somebody that the woman is white and older than the Black boy, that's making him look like the victim," she told The Daily Beast. "That's what Nicki Minaj was trying to do. She was trying to paint this [as an] Emmett Till story."

Jennifer grew up in South Jamaica, Queens, as did Petty and Minaj. The same woman who'd taken in and raised her mother as an infant did the same for her; Jennifer grew up calling the woman's older children her "aunts and uncles," and other relatives "cousins."

As previously reported by The Blast, court records indicate that both Petty and his victim were 16 years old at the time of the assault, which occurred in September of 1994. According to the complaint, the victim had been walking to school when Petty came up behind her, pressing an object to her back and instructing her to "keep walking." The two eventually arrived at Petty's residence, where he allegedly forced her upstairs and began to rape her at knifepoint before she was able to strike him with a bottle and escape.

Petty denied the rape allegation upon his arrest, court documents indicate; he claimed that he had only spoken with Jennifer that day before returning home to sleep, adding, "I didn't do anything."

After the assault, Jennifer ran to school to report the incident immediately. A close friend picked her up from the hospital and brought her back to her home. When she returned to the house and told her adoptive mother what happened, Jennifer said, she was simply told, "Sorry you got raped, but you should have screamed."



Kenneth Petty and Nicki Minaj attend Church On Sundays Hosted By Nicki Minaj And Phil The Mayor And DJ Clues Birthday Party at The Argyle on February 8, 2019, in Hollywood, California.

#### Johnny Nunez/Getty

Petty's parents, Jennifer added, responded to his arrest by telling her adoptive family that the two had been dating. (She is adamant they were not.)

"My family allowed his mother and father to take me to go see a district attorney and pretend like [they were] my aunt and uncle," she told The Daily Beast. "I think I kind of always just felt like people wanted me to be a liar."

Jennifer insists she never wrote a letter recanting any part of her account. But in the months that followed Petty's arrest, his friends allegedly harassed her family so severely that her adoptive aunt—the older daughter of the woman who raised her—brought her to the courthouse to drop the charges against Petty. Jennifer didn't drop the charges; overwhelmed, she moved to Florida as the case proceeded. (Jennifer's family members—and Barry—did not respond to requests for comment for this story.)

A close friend of Jennifer's at the time of the assault confirmed that she and Petty were never in a relationship, and said Jennifer had never expressed to them a desire to recant her story. They also recalled that the harassment Jennifer and her family faced was at one point so severe that Jennifer went to stay at a friend's house for a few days. Jennifer confirmed this, and said it was shortly before she moved to Florida, when things had become rough for her both inside and outside her home.

Petty was convicted in 1995 of one count of attempted rape in the first degree, assault in the second degree, unlawful imprisonment in the second degree, and criminal possession of a weapon. In 2006, he pleaded guilty to manslaughter—a reduction from the original charge, murder in the second degree, after a plea bargain—in the shooting death of Lamont Robinson, whom the original complaint alleges Petty shot multiple times. Petty served seven years of his 10-year sentence before his release in 2013, after which *People* reports he was on supervised release for five years.

Decades later, Jennifer says associates of Petty's have begun to harass her and her family once more.

Although Jennifer said she only knew Petty in passing and never met Minaj in person, the three share a complex network. Jennifer's brother allegedly shares a cousin with Petty, and she said her estranged adoptive cousin, Shiran Grayson, once lived with Minaj's friend TT. As various figures emerged from the woodwork to speak with Jennifer in the wake of Petty's arrest, it became impossible for her to know who she could trust.



"As various figures emerged from the woodwork to speak with Jennifer in the wake of Petty's arrest, it became impossible for her to know who she could trust."



Four days after Petty's arrest last March, a man named Barry, who Jennifer remembered had been close with her brother when they were all school-aged, reached out to her. Jennifer didn't think much of it at first when Barry mentioned Minaj and Petty, or even when he offered to make the fuss around the court case "go away." (The Blast had just published the criminal complaint months before.)

But then Barry allegedly told Jennifer that Minaj wanted to speak with her.

Even as she agreed to share her phone number, Jennifer didn't believe what was happening. "Next thing you know, my phone rings, and it's her."

As Jennifer recounts, Minaj told her she'd heard she was willing to help them out—"and if there's anything you need…" The rapper allegedly offered to fly Jennifer to Los Angeles, or to fly her publicist out to Atlanta.

It seemed at first like the Pettys wanted to discuss some kind of non-disclosure agreement, Jennifer said—some kind of pact in which they'd vow not to speak about her publicly and she'd do the same. At the same time, she recalls telling Minaj, "Listen. I just need you to know, woman to woman, this really happened."

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Minaj allegedly told Jennifer that she wanted her to have her number, but the two never spoke again. (The number has since been disconnected.)

Instead, Jennifer said her brother, with whom she is not particularly close, called within days of her conversation with Minaj to tell her that a man named Jamie from New York had called their cousin in North Carolina, offering \$500,000 if Jennifer spoke with a lawyer representing Petty. She never called the lawyer.

When asked about the offer, Barry allegedly denied that the money could have come from Minaj or Petty. Jennifer recalled him insisting that Petty had no money, and Minaj wouldn't give Petty the money either. "So I was confused as to how all of this was happening around me," she said. "I'm like, 'You say Nicki's not involved, but she's the one who called me.""

Barry, meanwhile, allegedly wanted Jennifer to write a letter recanting her rape allegation from 1994. She didn't want to do that, either—but unlike her brother and cousin, Barry now knew where she lived. That made her nervous.

Rather than say "no" outright and risk retaliation, Jennifer said she stalled Barry by expressing worry over being dragged back into court or even prosecuted. Barry allegedly began sending her information on the New York statute of limitations and insisting that she could not get in trouble, and even had her speak with multiple lawyers in order to convince her.

The Daily Beast has reviewed a screenshot from a text conversation between Jennifer and Charles Mittelstadt, a criminal defense investigator who declined to comment. A source confirmed that Jennifer did speak with Mittelstadt, as well as another attorney, Ian Wallach—and that during the latter conversation, Jennifer did not ask for legal advice about recanting, but instead explained the situation and expressed a desire to be left alone.

But Jennifer said the harassment did not stop. After Jennifer turned away the lawyers, Barry allegedly tried a different approach: Parked in a car outside her house, Jennifer said he offered her \$20,000 in cash if she agreed to sign a letter he'd typed that stated she'd lied about her assault. Barry allegedly told her he'd recoup his money on the back end.

"I came outside and sat in the car, and he pulled out the letter and the \$20,000 out of his middle console and put the money on my lap," Jennifer said. "And I held it in my hands, and I put it on the floor in the passenger seat. And I told him, 'I'm not taking it. I don't want it.""

It was right around this moment that it became clear to Jennifer just how little Barry, whom she'd trusted because of his old bond with her brother, actually cared about her wellbeing. "It was like this dude, he really doesn't give two shits about me," she said. "It's like, damn, don't you know I'm a mother of four? Don't you know I have kids? These are things I'm saying to him, and to have him come back to me and tell me, 'Well, you know how many girls can say that I probably raped them?""

In a Facebook video posted in December, Jennifer's daughter, Kenya, said she witnessed the incident. "I'm pulling up, and I'm witnessing a motherfucker putting 20 fucking bands, cash, on my mother's lap," she said. "Trying to ask my mom to write a letter. 20 bands? Like, are you serious? My mom put it right back." (Kenya declined comment for this story, but her video remains online.)

In the beginning of June, Jennifer became even more fearful when she received a call from her brother asking if she was OK. He told her that their cousin had called him again, and that this time he'd sounded terrified, telling him that "they" knew where she lived. (Jennifer assumed he was referring to, as she'd been told, the "OG's from the neighborhood" working for Petty.) "Don't be surprised if

That marked the first time Jennifer would move within her home state at the time, Georgia, and change her phone number out of fear for her safety.

As for why Jennifer's brother and former neighbor were so invested in Minaj and Petty's legal affairs? Barry wanted the rapper to appear at his daughter's 16th birthday party, she said. Her brother and cousin, meanwhile, allegedly wanted Minaj to do a walkthrough promotion at a club so they could split the profit.

At this point, Jennifer had no idea what to do. "I didn't know who to call," she said. "Who do I call?... I don't want to go to the cops and get them locked up because *then* what would that do to me? *Then* what would happen to me? Now, instead of having this person after me, I'm gonna have them and their family and their friends after me... It was chaos."

In late August, Jennifer moved to another home in Georgia after lawyers working for Petty called a phone number she'd registered under an assumed name. Days after she'd moved in, the U.S. Marshals showed up at her then-husband's job and told him they needed to speak with her. (The two have since separated.)

When the Marshals arrived at her home, Jennifer began to panic; they said they'd been informed she was being harassed to recant, but she had no idea how they'd gotten involved. She even texted Minaj, in the hopes that she could find out what was going on.



"As for why Jennifer's brother and former neighbor were so invested in Minaj and Petty's legal affairs? Barry wanted the rapper to appear at his daughter's 16th birthday party, she said. Her brother and cousin, meanwhile, allegedly wanted Minaj to do a walkthrough promotion at a club so they could split the profit."



"I didn't know if she was trying to help me out; I didn't know if she was trying to set me up," Jennifer said. "I didn't know if the people around me [were] trying to set me up."

But it was actually an online friend of Jennifer's who'd made the call.

Speaking with The Daily Beast on the condition of anonymity, the friend said that they had actually been a huge fan of Minaj's before the rapper coupled with Petty and they read about his history. As Minaj claimed Petty had been falsely accused and that he and his victim had been in a relationship, the source, a pre-law student, decided they wanted to help get justice for the woman he'd assaulted —"because she doesn't have a platform like that."

The source didn't know who Jennifer was at first. Their first contact with authorities came in the summer of 2019, when they alerted the NYPD that Petty had appeared on social media holding a gun and failed to update his address as mandated for registered sex offenders. Eventually, they managed to

Case 1:21-cv-04568-ENV-JRC Document 69-10 Filed 04/11/22 Page 28 of 29 PageID #: track down Jenniter. ("Have you ever watched Daggets \*\* \*k with Cats\* on Netflix?" they said. "I feel like that's what I'm doing.") In the spring of 2020, after months without a response, Jennifer reached out.

That August, the source emailed the U.S. Attorney prosecuting the federal case against Petty for not registering as a sex offender and relayed what Jennifer had shared about the harassment she was facing. That same month, they said, they also spoke with a U.S. Marshal and an ATF agent about the gun incidents—and asked them to check on Jennifer, whom they had not heard from in months.

"I said, 'If she doesn't want to talk to me that's fine, but please just lay eyes on her or contact her and just make sure that she's alive," they said.

Kenneth Petty's mugshot after his arrest for failing to register as a sex offender

#### State of California

When The Daily Beast contacted a U.S. Marshal whose professional contact Jennifer provided, a representative for the U.S. Attorney's Office in the Central District of California responded, and declined to comment regarding *USA v. Petty*.

Email metadata reviewed by The Daily Beast proves that Jennifer received email from the Justice Department's United States Department of Justice Victim Notification System. The Daily Beast has also reviewed screenshots taken after Jennifer logged into the system's online platform, which include updates on Petty's federal case.

The last time Jennifer moved was in October—after an older man approached her 22-year-old daughter, Kenya, in a club. In her Facebook video, Kenya says the man insisted she looked familiar and listed off her relatives after she shared that she was from South Jamaica, Queens. ("He named my mother," she said. "He named all her fucking brothers.") Then he asked if she knew Kenneth Petty.

"It was scary, and it made me feel threatened," Kenya said.

Jennifer had been out of town, and when she returned she decided that as long as she and Kenya lived in the same city, her daughter would never be able to safely lead a normal life. She left the state with her 5-year-old daughter.

"I just felt like if... I just leave the situation, then she can continue to live her life the way that she wants to live it without what I'm going through being a conflict," Jennifer said. "And it might not have been the best thing to do, but at the time, I didn't know what else to do."

Jennifer didn't come forward until the end of November, when she posted her first YouTube video. She kept the camera pointed away from her face as she discussed the misinformation surrounding her case and the harassment she'd endured. But as she spoke out, she and her adoptive family became more estranged—fissures that aired out on the YouTube blogosphere in ugly fashion.

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Jennifer's adoptive aunt, who allegedly took her to see the district attorney back in the 1990s, was actually the first person to speak publicly on her behalf, when she gave an interview to the YouTube

gossip blog Daytime Tea Time in 2018 to dispute the misinformation that had spread about Petty's assault victim, including the idea that they were in a relationship. But over the past few months, Jennifer's cousin Shiran "Sunday" Grayson—whom Jennifer alleges lived with Minaj's friend TT when discussion of the case arose in 2018—has disputed her account, primarily on the YouTube channel Black Tea Blog. (The channel has posted several videos attempting to discredit Jennifer's story and prove Petty is innocent.)

Not long after Jennifer posted her first video in November, she spoke live on Nosey's YouTube channel in early December—and wound up in a shouting match with Grayson, who was also in the audience and called her out by name. (Jennifer had not, at that point, disclosed any part of her identity publicly.) Grayson called her "delusional" and said she was "going too far."

"You need to cut it out," Grayson said. "You really need to before you get yourself hurt out here, homegirl."

Little over a week later, Jennifer posted a tearful follow-up video. In January, she posted another in which she finally showed her face—and implored Minaj and Petty, "Tell your fucking people to leave my family alone... Leave me and my family the fuck alone."

Three days later, the cousin Petty and Jennifer's brother share, Marie, also appeared on Black Tea Blog to call Jennifer a liar—and even threatened her on air.

"I know where you live, boo," she said. "... I ain't scared of police. Check my track record. I ain't never scared... Stand down, bitch." She threatened to make Jennifer's address public, and insinuated that doing so would help an abusive former partner, the father of Jennifer's younger daughter, hunt her down.

"Don't play with me, bitch," she said. "Seriously."

Although Jennifer said she has not received much direct harassment from Minaj's fans—most of her social media accounts are private—she noted that those who've advocated for her have. Both Nosey and Hotshot Radio, another YouTuber who's spoken out on her behalf for months and interviewed her on his channel, have been inundated with hateful comments and even threats.

In light of everything that's happened, it's not hard to understand why Nosey is concerned for Jennifer's safety as the case against Kenneth Petty moves forward. "If he does end up going to jail for being a sex offender and not registering, that can get really dangerous for her because [Jennifer is] going to be blamed," she said. "And they are associated with a lot of dangerous people."

Jennifer, meanwhile, recently retained legal counsel from Kaedian LLP. (The Daily Beast has viewed an engagement agreement.) She's moved once more, to a place where she's begun to actually feel safe. After all she's endured, she said, she has one hope: "For people out in the world to know that you can't do stuff like this and get away with it. And for women who have been abused, for women who have been assaulted, for them to not live in fear of speaking their truth. No matter who the person is."